

STATE OF SOUTH CAROLINA)

COUNTY OF RICHLAND)

D. Chad Lamoreaux, M.D. and Heidi Lamoreaux,)

☐ Plaintiff)

v.)

Palmetto Health; Charles D. Beaman, Jr., Et Al.)

☐ Defendant.)

IN THE COURT OF COMMON PLEAS

CASE NO.

2009-CP-40-1044

MOTION AND ORDER INFORMATION
FORM AND COVER SHEET

Plaintiff's Attorney:

David E. Rothstein, Esq., Bar No.

Burnette & Rothstein, P.A.

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Defendant's Attorney:

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Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

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☒ **MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)**☐ **FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)**☐ **PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)****SECTION I: Hearing Information**

Nature of Motion: Motion for Protective Order

Estimated Time Needed: 30 min. Court Reporter Needed: ☒ YES / ☐ NO**SECTION II: Motion/Order Type**☒ Written motion attached☐ Form Motion/Order

I hereby move for relief or action by the court as set forth in the attached proposed order.


Signature of Attorney for ☐ Plaintiff / ☐ Defendant *WTH/CD* Date submitted May 5, 2009**SECTION III: Motion Fee**☒ **PAID – AMOUNT: \$25.00**☐ **EXEMPT:** ☐ Rule to Show Cause in Child or Spousal Support(check reason) ☐ Domestic Abuse or Abuse and Neglect☐ Indigent Status ☐ State Agency v. Indigent Party☐ Sexually Violent Predator Act ☐ Post-Conviction Relief☐ Motion for Stay in Bankruptcy☐ Motion for Publication ☐ Motion for Execution (Rule 69, SCRCP)☐ Proposed order submitted at request of the court; or,

reduced to writing from motion made in open court per judge's instructions

Name of Court Reporter:

☐ Other:**JUDGE'S SECTION**☐ Motion Fee to be paid upon filing of the attached order.☐ Other:

JUDGE

CODE: _____ Date: _____

CLERK'S VERIFICATION

Date Filed:

Collected by: _____

STATE OF SOUTH CAROLINA)
)
 COUNTY OF RICHLAND)

IN THE COURT OF COMMON PLEAS
 CIVIL ACTION NO. 2009-CP-40-1044

D. Chad Lamoreaux, M.D., and)
 Heidi Lamoreaux,)
)
 Plaintiffs,)

vs.)

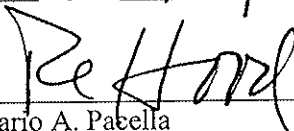
Palmetto Health; Charles D. Beaman,)
 Jr., in his individual and official)
 capacities; James L. Raymond, in his)
 individual and official capacities;)
 Katherine G. Stephens, in her individual)
 and official capacities; University of)
 South Carolina School of Medicine;)
 Donald J. DiPette, M.D., in his)
 individual and official capacities; John)
 J. Walsh, IV, M.D., in his individual)
 and official capacities; and David E.)
 Koon, M.D., in his individual and)
 official capacities,)

Defendants.)
)
 _____)

MOTION FOR PROTECTIVE ORDER

Comes now Gene Massey, by and through his undersigned counsel of record, and move this Honorable Court for an Order limiting the examination of the Deposition of Gene Massey. Plaintiffs deposed Gene Massey on April 30, 2009. Gene Massey declined to answer questions pursuant to his Fifth Amendment privilege (as incorporated to the states by way of the Fourteenth Amendment). To the extent Rule 30(d) requires Massey to file a motion to perfect his privilege, this motion requests like protection.

RESPECTFULLY SUBMITTED, this 5th day of May, 2009.



 Mario A. Patella
 Robert E. Hood
 Strom Law Firm, LLC
 2110 Beltline Boulevard, Suite A
 Columbia, South Carolina 29204
 (803)252-4800

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

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CIVIL ACTION NO. 2009-CP-40-1044

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Jr., in his individual and official)
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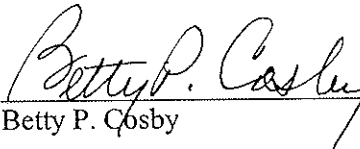
CERTIFICATE OF SERVICE

I Betty P. Cosby, an employee of the Strom Law Firm, LLC, do hereby certify that I have
this _____ day of May, 2009, served the Motion for Protective Order on the following by placing
in the U.S. Mail, proper postage affixed.

David E. Rothstein, Esquire
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Shahin Vafai, Esq.
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Betty P. Cosby

Columbia, South Carolina
May 5th, 2009